

FILED

AUG 11 2020

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

No. 20 CR 378

v.

Violations: Title 18, United States
Code, Sections 371 and 1708

STEPHON JOHNSON,
also known as "Steph,"
also known as "Stuff,"
LATRIECE BONNER, and
CATRINA BONNER

JUDGE GUZMAN

Magistrate Judge Jantz

COUNT ONE

The SPECIAL NOVEMBER 2019 GRAND JURY charges:

1. At times material to this indictment:
 - a. Defendant LATRIECE BONNER was employed by the United States Postal Service ("USPS").
 - b. As a part of her USPS employment, defendant LATRIECE BONNER was responsible for delivering mail in the area of Calumet City, Illinois.
 - c. Defendants LATRIECE BONNER and CATRINA BONNER were married.
2. From in or around December 2018, and continuing through in or around January 2020, in the Northern District of Illinois, Eastern Division, and elsewhere

STEPHON JOHNSON,
also known as "Steph,"
also known as "Stuff,"
LATRIECE BONNER, and
CATRINA BONNER,

defendants herein, conspired with each other and with others known and unknown to the Grand Jury to commit an offense against the United States, namely, to steal mail, in violation of Title 18, United States Code, Section 1708, and to possess, with intent to defraud, 15 or more unauthorized access devices, namely credit cards, thereby affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(3).

3. It was part of the conspiracy that defendant LATRIECE BONNER stole U.S. mail containing credit cards and other financial instruments and provided those items to defendant CATRINA BONNER and others in exchange for cash and other items of value.

4. It was further part of the conspiracy that defendant STEPHON JOHNSON unlawfully obtained USPS customer personal identifying information ("PII"), including USPS customer names, dates of birth, social security numbers, heights, weights, and addresses.

5. It was further part of the conspiracy that defendant STEPHON JOHNSON sold USPS customer PII to defendant CATRINA BONNER.

6. It was further part of the conspiracy that defendant CATRINA BONNER utilized the USPS customer PII unlawfully obtained from defendant STEPHON JOHNSON to fraudulently activate and use the stolen credit cards and other financial instruments provided to her by defendant LATRIECE BONNER.

7. It was further part of the conspiracy that defendant CATRINA BONNER provided stolen U.S. mail containing financial instruments that she

obtained from defendant LATRIECE BONNER to STEPHON JOHNSON and others, in exchange for cash and other items of value.

8. It was further part of the conspiracy that at least defendants CATRINA BONNER and STEPHON JOHNSON used the fraudulently obtained credit cards to make purchases without authorization.

Overt Acts

9. In furtherance of and to effect the objects of the conspiracy, defendants STEPHON JOHNSON, LATRIECE BONNER, and CATRINA BONNER committed and caused to be committed the following overt acts, among others, in the Northern District of Illinois:

a. On or about December 1, 2018, defendant LATRIECE BONNER stole a piece of U.S. mail addressed to Victim DF containing a Chase Bank credit card.

b. On or about April 10, 2019, defendant STEPHON JOHNSON sent a message to defendant CATRINA BONNER's cellular phone containing PII belonging to Victim ET.

c. On or about April 10, 2019, defendant CATRINA BONNER sent a message to defendant STEPHON JOHNSON's cellular phone containing an image of a piece of mail addressed to Victim SG.

d. On or about April 10, 2019, defendant STEPHON JOHNSON sent a message to defendant CATRINA BONNER's cellular phone containing PII belonging to Victim SG.

e. On or about June 29, 2019, defendant CATRINA BONNER sent a message to defendant STEPHON JOHNSON's cellular phone containing an image of a piece of mail addressed to Victim TH.

f. On or about June 29, 2019, defendant STEPHON JOHNSON sent a message to defendant CATRINA BONNER's cellular phone containing PII belonging to Victim TH. Between on or about July 2, 2019, and on or about July 3, 2019, a Chase Freedom credit card in Victim TH's name was used to make approximately \$1,364.07 in fraudulent purchases.

g. On or about July 6, 2019, defendant CATRINA BONNER sent a message to defendant STEPHON JOHNSON's cellular phone containing images of mail pieces addressed to Victim PS and Victim GR.

h. On or about July 6, 2019, defendant STEPHON JOHNSON sent a message to defendant CATRINA BONNER's cellular phone containing PII belonging to Victim GR. On or about July 6, 2019, a Capital One prepaid credit card in Victim GR's name was used to make approximately \$196.84 in fraudulent purchases.

i. On or about December 19, 2019, while inside her USPS vehicle, defendant LATRIECE BONNER stole U.S. mail by placing it inside her jacket.

j. On or about December 23, 2019, while inside her USPS vehicle, defendant LATRIECE BONNER opened pieces of U.S. mail that she then placed inside a plastic shopping bag, which, later that day, she provided to Individual B.

k. On or about January 10, 2020, defendant LATRIECE BONNER stole at least nine pieces of U.S. mail from her assigned mail delivery route, addressed to Victim AL, Victim DS, Victim HB, Victim JG, Victim HS, Victim MD, Victim JC, and Victim JM.

10. It was further part of the conspiracy that defendants STEPHON JOHNSON, LATRIECE BONNER, and CATRINA BONNER concealed and hid, and caused to be concealed and hidden, the purposes of the acts done in furtherance of the conspiracy.

In violation of Title 18, United States Code, Section 371.

COUNT TWO

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about April 10, 2019, at Chicago, in the Northern District of Illinois,
Eastern Division,

STEPHON JOHNSON,
also known as "Steph,"
also known as "Stuff," and
CATRINA BONNER,

defendants herein, did knowingly receive and possess mail, that previously had been
stolen from a mail route, and that defendants knew previously had been stolen,
namely one piece of mail addressed to Victim SG;

In violation of Title 18, United States Code, Section 1708.

COUNT THREE

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about January 10, 2020, at Calumet City, in the Northern District of Illinois, Eastern Division,

LATRICE BONNER,

defendant herein, did knowingly steal and take from and out of the mail, a letter, package and mail, namely nine pieces of mail addressed to Victim AL, Victim DS, Victim HB, Victim JG, Victim HS, Victim MD, Victim JC, and Victim JM;

In violation of Title 18, United States Code, Section 1708.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY